

The Essential Partner for Contractor Excellence

PO Box 2467, Santa Fe Springs, Ca 91754

Doug Hensel Assistant Deputy Director California Dept. of HCD Div. of Codes and Standards

Dear Mr. Hansel,

CALACCA is the California Chapter of ACCA representing the interests of our HVAC/R contractors and California contractors at large. Mr. Jeff Henning (whom you have been corresponding with) is one of our members; he has contacted us to express his concerns regarding the change to Chapter 6, Section 201.2 of the CMC. Like Mr. henning the majority of our members had adopted Manual-D long before being adopted into the CMC. The members of CALACCA have recognized the value of ANSI-Standards and have organized their contracting businesses to provide a higher level of installation practices, performance and energy savings for the betterment of the California consumers.

Our members are very much engaged in all aspects of the residential and commercial HVAC/R issues. Suffice it to say, ten days ago, the majority of the CSLB state experts updating the C-4 classification test were CALACCA members – I was one of those state experts. I am certain that you know the process which the CSLB relies upon when adding to the mechanical knowledge base – the CMC is heavily relied upon along with ASHRAE and ACCA standards. Mr. Wes Davis has already addressed ACCA's response to the change in the CMC.

Therefore, CALACCA joins ACCA-National and will also recommend:

- 1. The California Mechanical Code remove the noted exception.
- 2. To safeguard the California consumer, comply with manufacturer's instructions, help minimize energy usage, California should require prescriptive approaches for duct-sizing.
- 3. CALACCA will look forward to reading Chapter 6 as follows:

Chapter 6

Duct Systems

601.2 Sizing Requirements. Duct systems used with blower-type equipment that are portions of heating, cooling, absorption, evaporative cooling or outdoor air ventilation shall be sized in accordance with Chapter 17, or by other approved methods.

Respectfully,

George L. Rodriguez Chairman, ACCA – California